

CERTIFICATION OF CPNI FILING FEBRUARY 3, 2006  
EB-06-TC-060

VCI COMPANY

I, Stanley Johnson, President of VCI Company ("the Company"), hereby certify in compliance with 47 C.F.R. § 64.2009(e), that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("Commission") rules regarding use, disclosure of and permission of access to customer proprietary network information, 47 C.F.R §§ 64.2005, 2007-2009 ("CPNI Rules"). The attached statement explains how the Company's operating procedures ensure that it is in compliance with the CPNI Rules.

Submitted this 3rd day of February 2006.



VCI Company

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VCI COMPANY  
OPERATING PROCEDURES FOR ENSURING COMPLIANCE WITH  
47 U.S.C. § 222 and 47 C.F.R. §§ 64.2005, 2007- 2009

DEFINITION OF CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI") AND  
COMPANY GENERAL POLICY RE: TREATMENT OF CONFIDENTIAL INFORMATION

CPNI includes information 1) that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and 2) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI does not include subscriber list information, which is customer information published in a telephone directory.

The Company recognizes that every telecommunications carrier has a duty to protect the confidentiality of proprietary information of, and relating to, other telecommunications carriers, equipment manufacturers, and customers. The Company understands that a telecommunications carrier that receives or obtains proprietary information from another carrier for purposes of providing any telecommunications service is obligated to use such information only for such purpose, and is not permitted to use such information for its own marketing efforts.

DESCRIPTION OF COMPANY AND SERVICE PROVISION

VCI Company ("the Company") is a competitive local exchange service provider that serves primarily low-income, residential customers with federal and state subsidized Lifeline and Link-Up services. The only service the Company provides is local exchange service. The Company has no affiliates, parent company, joint-venture partners or independent marketing contractors.

MARKETING PROCEDURES

The Company markets its services solely through media advertisements and Company brochures that direct the prospective customer to contact the Company on the Company's toll-free telephone number. The Company does not initiate customer contact for the purpose of marketing its services and does not contract with third-parties other than media companies to market its services.

COMPANY USE, DISCLOSURE AND PERMISSION OF ACCESS TO CPNI

The Company obtains and utilizes CPNI solely for the purpose of providing competitive local exchange services to its customers, billing its customers for its services, collecting payment for its services, and maintenance and repair of services. Where necessary, the Company has the right to use, disclose or permit access to CPNI to protect its rights or property or the rights or property of its underlying carrier, to protect users of its services and other carriers from fraudulent, abusive, unlawful use of or unlawful subscription to its services.

The Company does not use, disclose, or permit access to CPNI to identify or track customers that call competing service providers or for any other purpose that is prohibited by the FCC's rules. The Company does not use, disclose or permit access to CPNI for any reason for which customer approval may be required pursuant to the Federal Communications Commission's rules pertaining to CPNI. The Company does not disclose CPNI of its current or former customers to any third-party except as required by law or regulation, or upon customer request.